

**Before the
FEDERAL COMMUNICATIONS COMMISSION**

In the Matter of)	
)	
COMCAST PHONE OF MICHIGAN, LLC)	ATTACHMENT 1
)	
Application for Authority Under)	
Section 214 of the Communications)	
Act of 1934, as amended, to Operate)	
as a Non-Dominant, Resale and)	
Facilities-Based Carrier for the)	
Provision of Telecommunications)	
Services from the United States to)	
International Points)	

Response to Question 9:

Comcast Phone of Michigan, LLC (“Comcast Phone MI”) or the “Applicant”), pursuant to section 63.12 of the Commission’s rules, 63 C.F.R. § 63.12, hereby requests streamlined processing of this Application. This Application is eligible for treatment under the Commission’s streamlined processing procedures for the following reasons: (a) the Applicant is not affiliated with a dominant U.S. carrier whose international switched or private line services the Applicant seeks authority by this Application to resell; (b) the Applicant does not seek authority by this Application to provide switched basic services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines; and (c) the Applicant is not affiliated with a foreign carrier in any destination country for which authority is requested by this Application, other than the following: Austria, the Czech Republic, Germany, Norway, Portugal, Spain, Switzerland and the United Kingdom.

With respect to the countries listed above, Comcast Phone MI qualifies for a presumption of non-dominance both under sections 63.10(a)(3) and 63.10(a)(4) of the Commission’s rules, 63 C.F.R. §§ 63.10(a)(3), 63.10(a)(4). As required by section 63.10(a)(3), the Applicant’s foreign affiliates lack fifty percent (50%) of the market share in both the international transport and local access markets on the foreign end of the route, and furthermore lack sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market. As required by section 63.10(a)(4), Comcast Phone MI intends to provide telecommunications services to the destination countries for which authority is requested by this Application only through the resale of an unaffiliated U.S. facilities-based carrier’s international switched services. Each of the affiliated destination markets for which Comcast Phone MI seeks authority to provide telecommunications services is a Member of the World Trade Organization.

Response to Question 11:

Pursuant to section 63.18(i) of the Commission's rules, 47 C.F.R. § 63.18(i), Comcast Phone MI hereby certifies that it is not a foreign carrier, but that it is affiliated with telecommunications carriers in the following destination countries: Austria, the Czech Republic, Germany, Norway, Portugal, Spain, Switzerland and the United Kingdom. Specifically, pursuant to section 63.09(e) of the Commission's rules, 47 C.F.R. § 63.09(e), the Applicant's ultimate parent, Comcast Corporation, indirectly owns more than twenty-five percent (25%) of the capital stock of a foreign carrier in each of the destination countries listed above.

Pursuant to section 63.18(j)(3) of the Commission's rules, 47 C.F.R. § 63.18(j), Comcast Phone MI hereby certifies that, by this Application, Comcast Phone MI seeks to provide telecommunications services to the following destination countries in which its ultimate parent, Comcast Corporation, also controls a foreign carrier in that country: Austria, the Czech Republic, Norway, Portugal, Switzerland and the United Kingdom. The relevant foreign carriers and respective destination countries are as listed below:

<u>Carrier</u>	<u>Destination County</u>
Broadnet Austria GmbH	Austria
Broadnet Czech AS	Czech Republic
Broadnet Norge AS	Norway
Broadnet Portugal SA	Portugal
Broadnet Suisse AS	Switzerland
Broadnet UK Ltd	United Kingdom

Pursuant to section 63.18(k)(1) of the Commission's rules, 47 C.F.R. § 16.18(k)(1), Comcast Phone MI hereby certifies that the destination countries listed pursuant to section 63.10(j)(3) are Members of the World Trade Organization.

Pursuant to section 63.18(l) of the Commission's rules, 47 C.F.R. § 16.18(l), Comcast Phone MI qualifies for a presumption of non-dominance under section 63.10(a)(3) of the Commission's rules, 47 C.F.R. § 63.10(a)(3). As required by section 63.10(a)(3), the Applicant's foreign affiliates lack fifty percent (50%) of the market share in both the international transport and local access markets on the foreign end of the route, and furthermore lack sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market.

Pursuant to section 63.18(m) of the Commission's rules, 47 C.F.R. § 16.18(m), Comcast Phone MI qualifies for a presumption of non-dominance both under sections 63.10(a)(3) and 63.10(a)(4) of the Commission's rules, 47 C.F.R. §§ 63.10(a)(3), 64.10(a)(4). As required by section 63.10(a)(3), the Applicant's foreign affiliates lack fifty percent (50%) of the market share in both the international transport and local access markets on the foreign end of the route, and furthermore lack sufficient market power on the foreign end of the route to affect competition adversely in the U.S. market. As required by section 63.10(a)(4), Comcast Phone MI intends to provide telecommunications services to the destination countries for which authority is requested by this Application only through the resale of an unaffiliated U.S. facilities-based carrier's

international switched services. Each of the affiliated destination markets for which Comcast Phone MI seeks authority to provide telecommunications services is a Member of the World Trade Organization.

Response to Question 12:

By this Application, Comcast Phone MI seeks authority to provide telecommunications services to the following destination countries listed pursuant to section 63.10(j)(3): Austria, the Czech Republic, Norway, Portugal, Switzerland and the United Kingdom.

Response to Question 13:

By this Application and pursuant to section 63.09(e) of the Commission's rules, 47 C.F.R. § 63.09(e), Comcast Phone MI seeks authority to provide telecommunications service to the following destination countries in which its ultimate parent, Comcast Corporation, indirectly owns more than twenty-five percent (25%) of the capital stock of a foreign carrier: Germany and Spain.

Response to Question 15:

Pursuant to section 63.18(d) of the Commission's rules, 47 C.F.R. § 63.18(d), Comcast Phone MI has not previously received authority to provide telecommunications service under Section 214 of the Act.

Pursuant to section 63.18(e)(3) of the Commission's rules, 47 C.F.R. § 63.18(e)(3), Comcast Phone MI, by this Application, does not seek authority to acquire facilities or to provide services not covered by sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules.

Pursuant to section 63.18(g) of the Commission's rules, 47 C.F.R. § 63.18(g), Comcast Phone MI, by this Application, does not seek authority to acquire facilities or to provide services not covered by sections 63.18(e)(1) and 63.18(e)(2) of the Commission's rules.